

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,
Plaintiffs,**

v.

**BRAD RAFFENSPERGER, ET AL.,
Defendants.**

Civil Action No. 1:17-CV-2989-AT

**SUPPLEMENTAL DECLARATION OF DAVID D. CROSS IN SUPPORT
OF PLAINTIFFS' JOINT MOTION FOR SANCTIONS**

I, David D. Cross, declare as follows:

1. I am a member of the bars of the State of New York and the District of Columbia. I am a partner with the law firm of Morrison & Foerster LLP, and lead counsel in this case representing Plaintiffs Donna Curling, Donna Price, and Jeffrey Schoenberg (the "Curling Plaintiffs) in the above-captioned matter. I have been admitted *pro hac vice* in these proceedings. I have personal knowledge of the facts in this declaration and, if called to testify as a witness, I would testify under oath to these facts.

2. This declaration supplements my previous declaration of October 11, 2019 (Dkt. No. 623-1), and supports the contemporaneously filed Reply in Support of Joint Motion for Sanctions. In addition to the fees and expenses described in my

previous declaration, Morrison & Foerster LLP also seeks the fees detailed herein incurred in connection with the GEMS Dispute and the litigation of the Joint Motion for Sanctions.

Reasonableness of Challenged Time Entries

3. Defendants, in their Opposition to Plaintiffs' Joint Motion for Sanctions, challenge a number of time entries made by Morrison & Foerster timekeepers. Defendants' arguments largely appear to result from their failure to properly read our time entries.

4. Defendants challenge my entries on June 29 and 30 and July 4 and 7, 2019, as well as Ms. Catherine Chapple's entries on July 16, as block-billed and containing "extensive conferences." (Opp. 32.) But this characterization is unfair and misleading.

5. First, every one of those five entries separately itemizes time spent on the GEMS Dispute from time spent on other matters in this case, and two of them further break down relevant time by task, such as by separately recording time for research, drafting declarations, and communicating with key individuals. (Dkt. No. 623-1 at 21-24.)

6. Second, my previous declaration included tables breaking down Ms. Chapple's and my claimed time by task. (Dkt. No. 623-1 at 5-6.) In the few cases

where our *time entries* did not fully break down the time spent on each task, we divided the total hours spent on the group of tasks by the number of tasks, and then assigned an equal amount of time to each task. The tables in my previous declaration were prepared by following this method to the extent necessary. I understand that this was the method relied upon by the Eleventh Circuit in *ACLU of Ga. v. Barnes*, 168 F.3d 423, 429 (11th Cir. 1999).

7. Third, as lead counsel for Curling Plaintiffs, it is imperative that I efficiently coordinate the work of a large number of people, especially when it involves what Defendants characterize as “complicated” and “highly technical” issues under a “rapid” schedule in the midst of many other responsibilities on this and other matters. Time spent in conferences with team members coordinating and discussing the substance of that work is an example of efficient, not inefficient, case management. These conferences are critical for ensuring necessary work occurs efficiently, with high quality, and on time. Further, when I communicate via email with multiple recipients or lead conference calls with multiple participants, including various combinations of attorneys at Morrison & Foerster, co-counsel, clients, and expert witnesses, it is often inefficient or impossible to itemize each such communication with further particularity than I have in my time entries.

8. Fourth, Defendants’ “extensive conferences” claim is simply not accurate. For example, Defendants challenge Ms. Chapple’s entries on July 9 and 10, 2019, as unreasonable, claiming that they include conferences “that appear to have lasted up to eight and nine hours in a day.” (Opp. 32.) But Ms. Chapple’s entries cannot be read that way. On July 9, in addition to discussing substantive issues with me, she also “[p]repared for and participate[d] in [a] call with defense counsel” and “*draft[ed a] brief re[garding] GEMS discovery.*” (Dkt. No. 623-1 at 25 (emphasis added).) On July 10, in addition to discussing strategy with me, she also “[p]articipate[d] in [a] call with [the C]ourt re[garding] GEMS discovery” and “*drafted [a] response to [the Court’s] minute order re[garding] Phase 1 of GEMS discovery.*” (*Id.* at 27 (emphasis added).)

9. Defendants next challenge three of our time entries on July 12 and 14 because the time was incurred after this Court’s order on July 9. However, this time arose from the restrictions on our review of the GEMS databases that we later learned were unnecessary.

10. Defendants additionally challenge one of my time entries on July 14 because it was spent dealing with their efforts to obtain a copy of Dr. Halderman’s malware. (Opp. 33.) I do not seek, and my previous declaration did not claim to seek any time spent dealing with Dr. Halderman’s malware. To the extent my July

14 time entry appears to include that time, it is the result of a clerical error in redaction. The final clause separated by a semicolon does not include any tasks related to Dr. Halderman's malware and the parenthetical time claimed in that entry refers only to the final clause separated by a semicolon. (Dkt. No. 623-1 at 30.) In other words, the time for the task Defendants complain about was not included among the fees sought in the Motion.

11. Defendants also challenge the fees and expenses charged by Dr. Halderman.

12. Defendants imply that Dr. Halderman's time on August 15, 19, and 21 was improper because he spent it "moving the secure facility to another location at the university." (Opp. 38.) But this was required only because of the restrictions on his review that arose from Defendants' misrepresentations that the GEMS databases were unique and confidential. Absent those misrepresentations and corresponding restrictions, the costs associated with this task never would have arisen.

13. Finally, Defendants argue that Plaintiffs should not recover any of Dr. Halderman's expenses because he does not include documentation. (Opp. 38.) Curling Plaintiffs have already filed appropriate documentation of his expenses in connection with their fee request under 42 U.S.C. § 1988. (Dkt. No. 631 at 290-

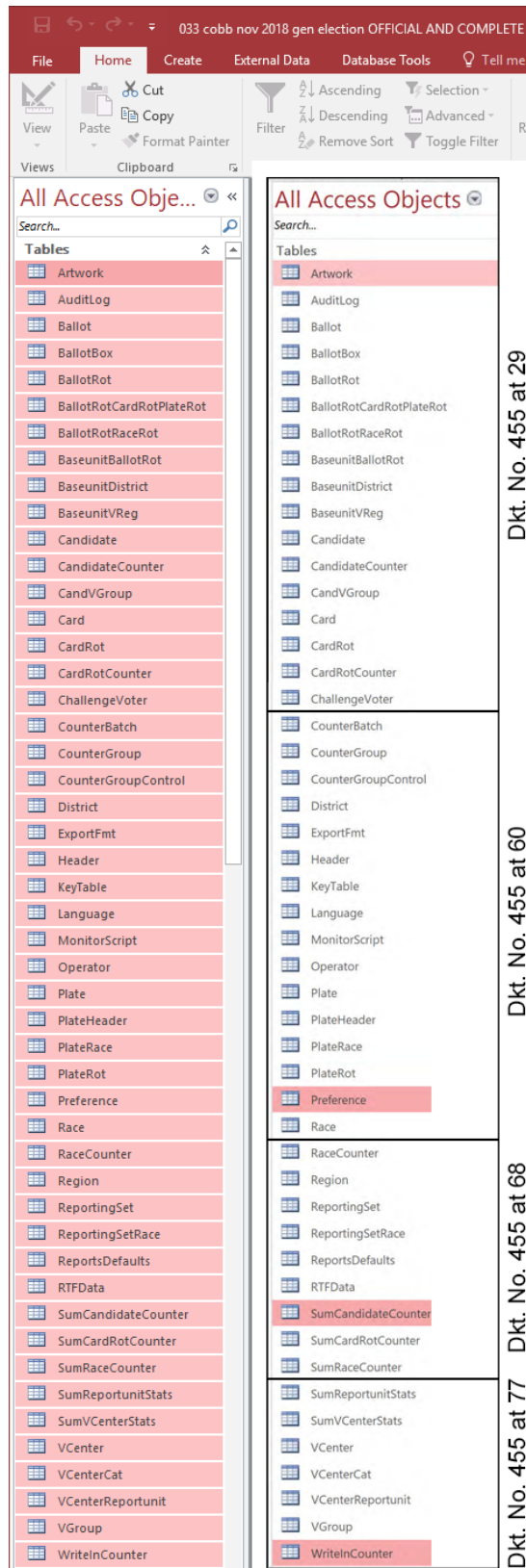
91.) Consistent with his invoice submitted along with the Joint Motion for Sanctions, Morrison & Foerster actually paid him \$856.99 for relevant expenses. (Dkt. No. 623-3 at 9.) However, due to a clerical error, Dr. Halderman's expenses were actually \$19.77 less than appeared on his invoice. (Dkt. No. 631 at 291 (showing cost of computer was \$779.23, not \$799.00).) Therefore, Morrison & Foerster reduces its claimed amount by \$19.77.

Simplicity of Comparison of GEMS Databases

14. Defendants' counsel claim that they "lacked the ability" to compare "the structure of databases with almost 50 tables." (Opp. 19-20.) They do not support or explain this allegation, and it is difficult to understand. I have compared Georgia's current GEMS databases to publicly-available ones and found no difficulty with the comparison—and I have no specialized technical training.

15. I understand that below is a screenshot that compares, on the left side, the table names of the 2018 Cobb County GEMS database that Defendants produced in response to the Court's Order compelling production, as viewed in Microsoft Access, with, on the right side, the table names visible in the screenshots Plaintiffs filed of the publicly-available 2002 Cobb County database (Dkt. No. 455 at 29-77). The side-by-side comparison readily shows that the table names in both databases are identical:

The left side of this image is a complete list of table names from the 2018 Cobb County database, which the Court ordered Defendants to produce, as they appear in Microsoft Access.



Dkt. No. 455 at 29

Dkt. No. 455 at 60

Dkt. No. 455 at 68

Dkt. No. 455 at 77

The right side of this image is a complete list of table names from the 2002 Cobb County database that is publicly available online, as they appear in the screenshots Plaintiffs filed.

All 49 table names are identical.

16. Although Defendants specifically relied on misrepresentations regarding table names, the comparison of the field names (the column headers at the top of the grid) was also not technically challenging. All Defendants had to do to verify that the field names were substantially identical was to double click on each table's name in Microsoft Access. This would open the tables, as shown in the screenshots Plaintiffs filed. Then they could visually compare the field names to those in Plaintiffs screenshots.

17. While Dr. Halderman has previously described more detailed comparison techniques in his declaration of July 15, 2019, (Dkt. No. 487-3, Halderman Decl. ¶ 14), such techniques were unnecessary to conclude that Georgia's GEMS databases did not contain any unique table names or field names when compared with publicly-available GEMS databases. And Defendants do not claim that Merritt Beaver was unable to perform such a comparison with the publicly-available screenshots Plaintiffs filed with the Court.

Identification of Additional Time Expended

18. Since the filing of my previous declaration, I oversaw and coordinated strategy regarding the Joint Motion for Sanctions with Dr. J. Alex Halderman and counsel for Curling Plaintiffs and Coalition Plaintiffs. I also communicated with Defendants regarding the Joint Motion for Sanctions.

19. I personally revised and oversaw the drafting and filing of the briefs, declarations, and supporting exhibits filed in connection with Plaintiffs' Joint Motion for Sanctions.

20. I personally reviewed the detailed fee report that the Morrison & Foerster accounting department generated on November 12, 2019. A true and correct copy of that report is attached to this declaration as **Appendix A**.

21. The non-redacted entries accurately reflect the additional time the Morrison & Foerster team expended in connection with the GEMS Dispute or in connection with the Joint Motion for Sanctions.

Detailed Breakdown and Reasonableness of Additional Time

22. Jenna Conaway, senior paralegal, spent an additional **33.5 hours** on the GEMS Dispute or on the Joint Motion for Sanctions. As described in my previous declaration, her hourly rate in 2019 was \$375 per hour.

J. Conaway	Additional Hours Spent in GEMS Database Discovery Dispute		
	Category	Hours	Fees Requested at \$375/hr
	Cite-check briefs	16.00	\$6,000.00
	Gather and review billing records and identify GEMS-related entries	5.75	\$2,156.25
	Assist with edits to declarations	1.75	\$656.25
	Redact billing records	5.75	\$2,156.25
	Finalize documents for filing and file	4.25	\$1,593.75
	Subtotal for J. Conaway	33.50	\$12,562.50

23. Jane Bentrott is an associate in the firm's litigation practice. Her hourly rate in 2019 was \$ 695. She recorded a total of **6.5 hours** in connection with Plaintiffs' Joint Motion for Sanctions.

J. Bentrott	Hours Spent in GEMS Database Discovery Dispute		
	Category	Hours	Fees Requested at \$695/hr
	Review sanctions briefing	3.25	\$2,258.75
	Correspond with MoFo team and opposing counsel	0.50	\$347.50
	Research relevant case law and summarize same	2.75	\$1,911.25
	Subtotal for J. Bentrott	6.50	\$4,517.50

24. Austin Uhler is an associate in the firm's litigation practice. His hourly rate in 2019 was \$490 and he spent **91.5 hours** in connection with Plaintiffs' Joint Motion for Sanctions.

A. Uhler	Hours Spent in GEMS Database Discovery Dispute		
	Category	Hours	Fees Requested at \$490/hr
	Review Defendants' brief	1.25	\$612.50
	Correspond and coordinate with MoFo team, co-counsel, and/or expert	9.75	\$4,777.50
	Review filings and transcripts to gather facts	10.50	
	Draft and revise briefs	45.25	\$22,172.50
	Draft and revise declarations	12.25	\$6,002.50
	Research relevant case law	13.75	\$6,737.50
	Subtotal for A. Uhler	91.50	\$39,690.00

25. According to the contemporaneous time records and based on my professional experience, I believe the preceding tables represent a fair and accurate breakdown of each timekeeper's relevant time by task.

26. The total amounts of time spent by each Morrison & Foerster timekeeper were reasonable and necessary to resolve the GEMS Dispute and recover our fees and costs needlessly incurred in that dispute.

27. Thus, the total *additional* amount of reasonable fees incurred by Morrison & Foerster timekeepers in connection with the GEMS Dispute was **\$56,750.23**. In combination with the fees sought in my previous declaration, (Dkt. No. 623-1 (\$120,338.75)), the total amount of reasonable fees and expenses incurred by Morrison & Foerster timekeepers in connection with the GEMS Dispute was **\$177,088.98**.

I declare under penalty of the perjury laws of the State of Georgia and the United States that the foregoing is true and correct and that this declaration was executed this 12th day of November, 2019, in Washington, D.C.

/s/ David D. Cross

David D. Cross

APPENDIX A

Client: 089828 - CURLING, DONNA (P) 11/12/2019

Date	Initials	Name / Invoice Number	Hours	Amount	Description	Matter Number	Index
9/8/2019	19898	DAVID D. CROSS	0.25	266.25	Communicate with CP counsel re sanctions, and	089828-0000001	57637846
10/31/2019		Invoice=	0.25	266.25	attention to strategy re same.		

1. The first step in the process of identifying a problem is to recognize that a problem exists. This is often done by comparing current performance with a desired state or goal. If there is a significant difference, a problem is identified.

2. Once a problem is identified, the next step is to define the problem more precisely. This involves determining the scope of the problem, the resources available, and the constraints that may be affecting the problem.

3. The third step is to analyze the problem. This involves identifying the causes of the problem and determining the relationships between different factors. This step is often done using tools such as fishbone diagrams or flowcharts.

4. The fourth step is to develop a solution. This involves brainstorming ideas and evaluating them against the criteria of feasibility, effectiveness, and cost. The best solution is then selected and implemented.

5. The final step is to evaluate the results of the solution. This involves monitoring the performance of the system over time and comparing it to the desired state. If the problem has been solved, the process ends. If not, the process starts over.

Date	Initials	Name / Invoice Number	Hours	Amount	Description	Matter Number	Index

Date	Initials	Name / Invoice Number	Hours	Amount	Description	Matter Number	Index

Date	Initials	Name / Invoice Number	Hours	Amount	Description	Matter Number	Index

Client: 089828 - CURLING, DONNA (P) 11/12/2019

Date	Initials	Name / Invoice Number	Hours	Amount	Description	Matter Number	Index
9/27/2019	19929	JENNA B. CONAWAY	7.25	2,718.75	Cite-check Plaintiffs' Joint Motion for	089828-0000001	57535492
10/31/2019		Invoice=	7.25	2,718.75	Sanctions.		
9/27/2019	20403	AUSTIN MICHAEL UHLER				089828-0000001	57478486
10/31/2019		Invoice=					
			0.5				
					draft declaration of H. Knapp in support of		
					motion for sanctions and fees on GEMS discovery		
					dispute and correspond with A. Sparks regarding		
					same (0.5).		
9/28/2019	19898	DAVID D. CROSS			Work on sanctions motion and communicate with	089828-0000001	57637859
10/31/2019		Invoice=			team and CP counsel re same;		

Client: 089828 - CURLING, DONNA (P) 11/12/2019

Date	Initials	Name / Invoice Number	Hours	Amount	Description	Matter Number	Index
			0.5		[REDACTED]		
					[REDACTED]		
					[REDACTED]		
9/30/2019	20403	AUSTIN MICHAEL UHLER	[REDACTED]		[REDACTED]	089828-0000001	57510345
10/31/2019		Invoice=	[REDACTED]		[REDACTED]		
			3		[REDACTED]		
					[REDACTED]; correspond with D. Cross regarding sanctions motion (0.25); [REDACTED]		
					[REDACTED]		
					[REDACTED] revise motion for sanctions (2.75).		
9/30/2019	19929	JENNA B. CONAWAY	[REDACTED]		[REDACTED] Review fee statements and highlight additional entries to capture for sanctions regarding GEMS fees (2.0); [REDACTED]	089828-0000001	57600624
10/31/2019		Invoice=	[REDACTED]		[REDACTED]		
			2		[REDACTED]		
					[REDACTED]		
10/1/2019	20403	AUSTIN MICHAEL UHLER	[REDACTED]		[REDACTED] Revise motion for sanctions (3); draft declarations in support of motion for sanctions (7.75); correspond with MoFo team, local counsel, Coalition counsel, and A. Halderman regarding declarations in support of motion for sanctions (1); [REDACTED]	089828-0000001	57533385
			11.75		[REDACTED]		
					[REDACTED]		
					[REDACTED]		
					[REDACTED]		
					[REDACTED]		
					[REDACTED]		
10/1/2019	19929	JENNA B. CONAWAY	[REDACTED]		[REDACTED] Redact non-highlighted portions of the fee statements as directed by A. Uhler, coordinate regarding additional details for filing (2.25); [REDACTED]	089828-0000001	57600661
			2.25		[REDACTED]		
					[REDACTED]		
					[REDACTED]		

Client: 089828 - CURLING, DONNA (P) 11/12/2019

Date	Initials	Name / Invoice Number	Hours	Amount	Description	Matter Number	Index
10/2/2019	20403	AUSTIN MICHAEL UHLER	1	[REDACTED]	Correspond with B. Brown, A. Sparks, and J. Conaway regarding declarations in support of motion for sanctions (1); [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]	089828-0000001	57594968

Client: 089828 - CURLING, DONNA (P) 11/12/2019

Date	Initials	Name / Invoice Number	Hours	Amount	Description	Matter Number	Index
10/4/2019	20403	AUSTIN MICHAEL UHLER	1.25		Correspond with B. Brown regarding status of sanctions motion (0.25); [REDACTED]; correspond with A. Halderman regarding motion for sanctions (0.25); correspond with A. Sparks regarding motion for sanctions (0.25); revise declaration of A. Halderman in support of motion for sanctions based on updated billing records (0.5); [REDACTED]	089828-0000001	57558611
10/5/2019	20403	AUSTIN MICHAEL UHLER	0.25		Correspond with D. Cross regarding evidence in support of sanctions motion (0.25); [REDACTED]	089828-0000001	57558609
10/7/2019	20403	AUSTIN MICHAEL UHLER	0.5		[REDACTED]; correspond with C. Chapple and J. Conaway regarding time records in support of motion for sanctions (0.5); [REDACTED]	089828-0000001	57572911
10/7/2019	19929	JENNA B. CONAWAY	1.5		Coordinate with A. Uhler and others regarding documentation needed for sanctions regarding GEMS discovery brief (0.5); draft list of critical dates, docket numbers and descriptions for C. Chapple to assist with her review of time spent on GEMS discovery (1.0); [REDACTED]	089828-0000001	57601202

[illegible]

Client: 089828 - CURLING, DONNA (P) 11/12/2019

Date	Initials	Name / Invoice Number	Hours	Amount	Description	Matter Number	Index
					(1.0); request updated billing and cost records		
					(0.25); review time entries selected for Motion		
					for Sanctions filing (0.75); discuss detailed		
					time descriptions for C. Chapple with G. Mejia		
					(0.25).		
10/11/2019	19929	JENNA B. CONAWAY	7	2,625.00	Assist A. Uhler with finalizing declaration	089828-0000001	57840963
					(0.75); review detailed time entries from C.		
					Chapple and draft directions to G. Mejia to		
					revise entries in billing system (1.25); redact		
					fees statement to reflect relevant time entries		
					and finalize declaration and exhibits (4.5);		
					file via ECF (0.5).		
10/11/2019	20403	AUSTIN MICHAEL UHLER	2.25			089828-0000001	57646226
					correspond with J. Conaway,		
					C. Chapple, D. Cross, and G. Mejia regarding		
					time records in support of sanctions motion		
					(0.5); revise declaration and embedded tables		
					in support of sanctions motion (1.5); revise		
					sanctions motion papers accordingly (0.25).		

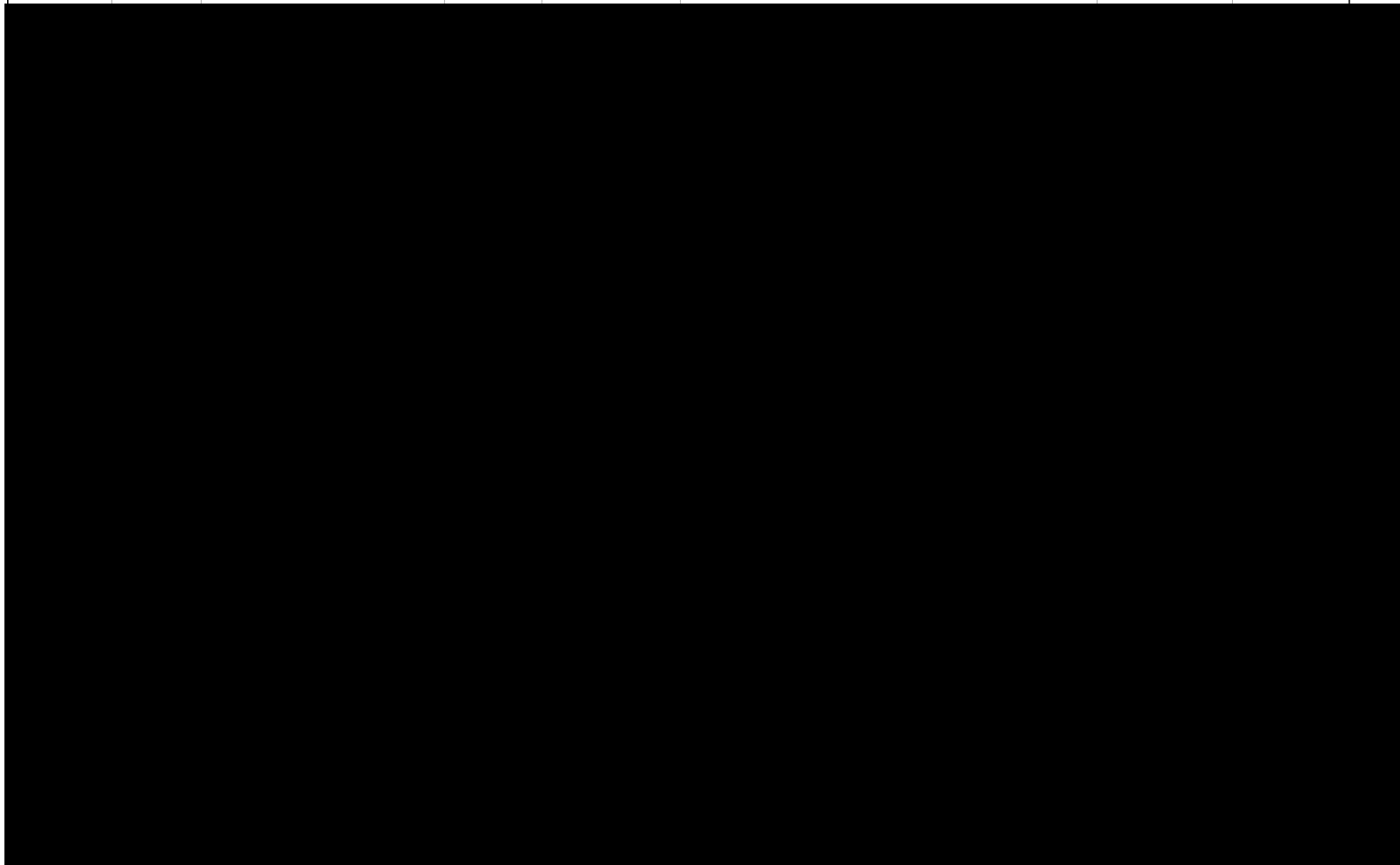
Date	Initials	Name / Invoice Number	Hours	Amount	Description	Matter Number	Index

Client: 089828 - CURLING, DONNA (P) 11/12/2019

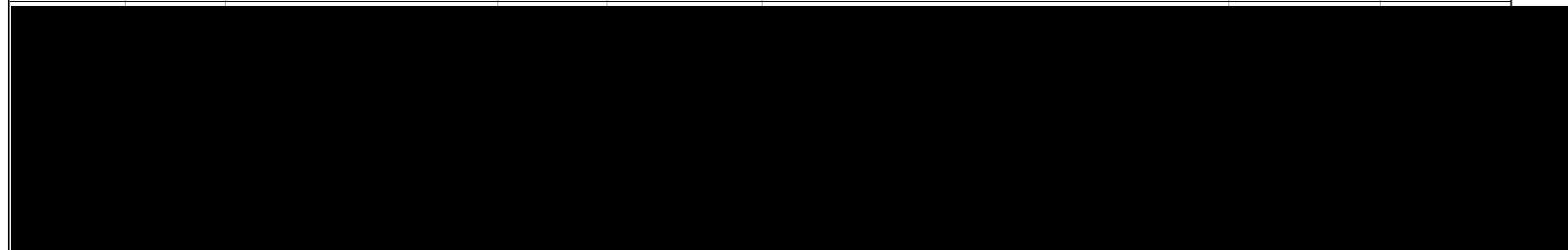
[illegible]

Client: 089828 - CURLING, DONNA (P) 11/12/2019

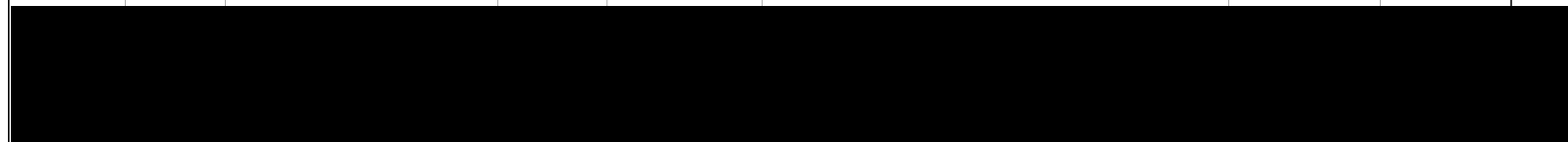
Date	Initials	Name / Invoice Number	Hours	Amount	Description	Matter Number	Index
10/28/2019	20403	AUSTIN MICHAEL UHLER	2.25	1,102.50	Review defendants' response in opposition to motion for sanctions (1.25); draft reply in support of motion for sanctions (1).	089828-0000001	57792034



10/29/2019	20403	AUSTIN MICHAEL UHLER	6.25	3,062.50	Revise reply brief in support of sanctions motion (3); review filings and transcripts regarding details of GEMS dispute in support of same (2); research sanctions case law in Eleventh Circuit in support of same (1.25).	089828-0000001	57792140



10/30/2019	20403	AUSTIN MICHAEL UHLER	4.5	2,205.00	Revise reply brief in support of sanctions motion (3); review filings and transcripts regarding details of GEMS dispute in support of same (1.5).	089828-0000001	57792143



Date	Initials	Name / Invoice Number	Hours	Amount	Description	Matter Number	Index
10/31/2019	20403	AUSTIN MICHAEL UHLER	4			089828-0000001	57792148
					(2); revise		
					reply brief in support of sanctions motion		
					(2.75); review filings and transcripts		
					regarding details of GEMS dispute in support of		
					sanctions motion (1.25).		
11/1/2019	20403	AUSTIN MICHAEL UHLER	7.25	3,552.50	Revise reply brief in support of sanctions	089828-0000001	57823544
					motion (3); review filings and transcripts		
					regarding details of GEMS dispute in support of		
					same (2); research sanctions case law in		
					Eleventh Circuit in support of same (2.25).		
11/2/2019	20403	AUSTIN MICHAEL UHLER	3.25	1,592.50	Revise reply brief in support of sanctions	089828-0000001	57818773
					motion (3.25).		

Client: 089828 - CURLING, DONNA (P) 11/12/2019

Date	Initials	Name / Invoice Number	Hours	Amount	Description	Matter Number	Index
11/4/2019	20403	AUSTIN MICHAEL UHLER	10.25	5,022.50	Revise reply brief in support of sanctions motion (6.5); review filings and transcripts regarding details of GEMS dispute in support of same (1.25); research sanctions case law in Eleventh Circuit in support of same (2.5).	089828-0000001	57819126
11/5/2019	20403	AUSTIN MICHAEL UHLER	4		Revise reply brief in support of sanctions motion (3.75); correspond with D. Cross and A. Sparks regarding reply brief in support of sanctions motion (0.25);	089828-0000001	57835429
11/6/2019	19972	JANE P. BENTROTT	0.5	347.5	Correspond with team and opposing counsel regarding sanctions briefing.	089828-0000001	57873076
11/6/2019	20403	AUSTIN MICHAEL UHLER	6.5	3,185.00	Correspond with D. Cross and J. Conaway regarding reply in support of sanctions motion (0.75); gather and summarize record evidence in support of key fact issues outlined by D. Cross in support of same (2.5); research cases where sanctions were awarded against attorney instead of party (1.5); correspond with A. Halderman and J. Conaway regarding visual aid exhibit in support of sanctions reply (0.75); correspond with B. Brown regarding sanctions reply portions specific to Coalition plaintiffs (0.5); draft motion for excess pages for reply brief in support of sanctions motion (0.5).	089828-0000001	57849086
11/6/2019	19929	JENNA B. CONAWAY	1	375	Coordinate with team regarding timing and scope of work on Plaintiffs' Reply ISO Motion for Sanctions (0.25); revise draft Motion for Extension of Time and for Excess Pages, finalize, file via ECF, and circulate service copies to Ms. Cole and Mr. Martin (0.75).	089828-0000001	57895690
11/7/2019	20403	AUSTIN MICHAEL UHLER	3.25	1,592.50	Research cases in Eleventh Circuit where sanctions were awarded against attorneys (2); correspond with D. Cross regarding research for sanctions motion (0.5); draft supplemental D. Cross declaration in support of sanctions motion (0.75).	089828-0000001	57864122
11/8/2019	20403	AUSTIN MICHAEL UHLER	1.25	612.5	Correspond with A. Halderman regarding comparison of GEMS databases in support of motion for sanctions (0.5); review D. Cross' edits and comments on draft sanctions reply	089828-0000001	57894850

Client: 089828 - CURLING, DONNA (P) 11/12/2019

Date	Initials	Name / Invoice Number	Hours	Amount	Description	Matter Number	Index
					brief (0.75).		
11/9/2019	20403	AUSTIN MICHAEL UHLER	4	1,960.00	Correspond with D. Cross regarding sanctions reply brief (0.25); correspond with J. Conaway regarding documentation for expert expenses sought to be recovered in sanctions motion (0.25); research additional caselaw for sanctions reply brief (1); revise sanctions reply brief (2.5).	089828-0000001	57894851
11/9/2019	19929	JENNA B. CONAWAY	0.25	93.75	Review invoice discrepancy for Halderman computer and confer with A. Uhler (0.25).	089828-0000001	57895691
11/10/2019	20403	AUSTIN MICHAEL UHLER	5	2,450.00	Correspond with D. Cross, M. Kaiser, and B. Brown regarding edits to sanctions reply brief (0.75); research additional caselaw for sanctions reply brief (1.75); revise sanctions reply brief (2.5).	089828-0000001	57894913
11/11/2019	20403	AUSTIN MICHAEL UHLER	10.25	5,022.50	Correspond with D. Cross, M. Kaiser, J. Bentrott, and J. Conaway regarding additional research and logistics for filing reply in support of sanctions reply (0.75); research additional caselaw for sanctions reply (1.5); revise sanctions reply (5.5); draft supplemental D. Cross declaration in support of sanctions reply (2.5).	089828-0000001	57894914
11/11/2019	19972	JANE P. BENTROTT	5.5	3,822.50	Review reply brief in support of sanction motion; conduct and summarize factual and legal research in support of sanctions motion.	089828-0000001	57895655
11/11/2019	19929	JENNA B. CONAWAY	9.25	3,468.75	Coordinate with A. Uhler, review draft reply brief, prepare additional record citations, and begin cite-check of Plaintiff's Reply ISO Motion for Sanctions regarding GEMS databases (8.75); coordinate with billing specialists to prepare updated fees report for use as an exhibit to the Reply ISO Motion for Sanctions (0.5).	089828-0000001	57895741